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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MARIA JIMENEZ,

Plaintiff,

vs.

GEICO GENERAL INSURANCE  
COMPANY, an entity licensed to do business  
in the State of Nevada; DOES I through V; and  
BUSINESS ENTITIES VI through X,  
inclusive,

Defendants.

CASE NO.: 2:19-cv-00984-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND THE PRE-TRIAL ORDER  
DEADLINE (FOURTH REQUEST)**

Plaintiff Maria Jimenez (“Plaintiff”), by and through her attorneys of record of GGRM Law Firm, and Defendant GEICO General Insurance Company (“GEICO”), by and through its attorneys of record of the law firm McCormick, Barstow, Sheppard, Wayte, & Carruth LLP, hereby file this Stipulation and Order to Extend the Pre-Trial Order Deadline (Fourth Request), specifically seeking to extend the deadline by 60 days.

**IT IS HEREBY STIPULATED AND AGREED** between the parties to extend the joint pre-trial order deadline of March 8, 2021. In accordance with Local Rule 26-4, the parties state as follows:

**I. DISCOVERY COMPLETED BY THE PARTIES:**

The parties have served their initial disclosures. Both parties have propounded and answered written discovery. Plaintiff’s deposition testimony was provided on February 6, 2020.



## II. DISCOVERY WHICH REMAINS TO BE COMPLETED:

For all intents and purposes, discovery has concluded, and the parties merely seek to extend deadline to submit the join pre-trial order.

As noted above, the parties have been working diligently throughout the discovery process and discovery has effectively concluded but for the joint pre-trial order. Currently, the parties have a mediation scheduled for March 18, 2021. The parties believe the mediation will help accelerate this matter towards a resolution without proceeding to trial.

### III. GOOD CAUSE EXISTS TO GRANT THE REQUESTED EXTENSION

If the mediation proves to be beneficial and the parties agree to a resolution, a Pre-Trial Order will be unnecessary. Should the mediation conclude at a stalemate, the parties are ready to proceed with a trial.

The parties request that the pertinent discovery deadlines set forth in the Court's Scheduling Order be continued ninety (60) days, as follows:

1           A.       PRETRIAL ORDER: Unless otherwise stated herein, and the Court so orders,  
2 the joint pretrial order shall be filed ~~ninety~~ (60) days from its current deadline of March 8, 2021,  
3 but not later than May 7, 2021.

4           DATED this 5<sup>th</sup> day of March, 2021.

5           **GGRM LAW FIRM**

7           */s/ William T. Martin*

8           **DILLON G. COIL, ESQ.**

9           Nevada Bar No. 11541

10           **WILLIAM T. MARTIN, ESQ.**

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13           2770 S. Maryland Pkwy., Ste. 100

14           Las Vegas, NV 89109

15           Attorneys for Plaintiff

16           DATED this 5<sup>th</sup> day of March, 2021.

17           **MCCORMICK, BARSTOW, SHEPPARD,**

18           **WAYTE & CARRUTH LLP**

20           */s/ Jonathan W. Carlson*

21           **WADE M. HANSARD, ESQ.**

22           Nevada Bar No. 8104

23           **JONATHAN W. CARLSON, ESQ.**

24           Nevada Bar No. 10536

25           8337 W. Sunset Road, Suite 350

26           Las Vegas, Nevada 89118

27           Attorneys for Defendant

16           **ORDER**

19           **IT IS SO ORDERED:**

21           DATED this 5<sup>th</sup> day of March, 2021

22           IT IS HEREBY ORDERED that the  
23           Joint Pretrial Order must be filed on  
24           or before May 10, 2021.

25           If dispositive motions are filed, the  
26           deadline for filing the joint pretrial  
27           order will be suspended until 30  
28           days after decision on the  
          dispositive motions or further court  
          order.



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77           **UNITED STATES MAGISTRATE JUDGE**

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5, I certify that I am an employee of GGRM LAW FIRM, and that on the 5<sup>th</sup> day of March, 2021, I caused the foregoing document, entitled **STIPULATION AND ORDER TO EXTEND THE PRE-TRIAL ORDER DEADLINE (FOURTH REQUEST)** to be served via electronic service and/or US Mail upon all parties involved in this litigation.

*/s/ Michael Madden*

## An Employee of GGRM LAW FIRM

